

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

SEACORP LLC

f/k/a SYSTEMS ENGINEERING
ASSOCIATES CORPORATION

Plaintiff

v

TITAN ONE ZERO LLC

Defendant

Case No: 1:22-cv-01019-PTG-IDD

PLAINTIFF’S, SEACORP, LLC, RULE 26(a)(3) DISCLOSURES

Plaintiff, SEACORP, LLC, formerly known as Systems Engineering Associates Corporation (“Plaintiff” or “SEACORP”), by and through its undersigned counsel, pursuant to Federal Rule of Civil Procedure 26(a)(3), hereby submit the following witness and exhibit lists in advance of trial, as follows:

I. WITNESS LIST

A. Witnesses Who are Expected to Be Called at Trial

1. Jason Vetovis, Vice President, SEACORP, LLC, 62 Johnny Cake Hill, Middletown, RI 02842, (401) 847-2260
2. Elizabeth Goetz-Patridge, Vice President of Contracts, SEACORP, LLC, 62 Johnny Cake Hill, Middletown, RI 02842, (401) 847-2260
3. Samuel Tannett, Systems Engineer, SEACORP, LLC, 62 Johnny Cake Hill, Middletown, RI 02842, (401) 847-2260
4. David Cadorette, President, SEACORP, LLC, 62 Johnny Cake Hill, Middletown, RI 02842, (401) 847-2260
5. Custodian of records, SEACORP, LLC, 62 Johnny Cake Hill, Middletown, RI 02842, (401) 847-2260

B. Witnesses Who May Be Called at Trial if the Need Arises

1. Brian Mooney, Plaintiff's former System's Engineer, 4 Cedar Drive, North Stonington, CT 06359, (585) 729-4357
2. Daniel R. Todd – Plaintiff's former System's Engineer, 681 Groton Long Point Road, Groton, CT 06340, (774) 571-8435

C. Witnesses Whose Testimony is Expected to Be Presented by Deposition

1. Kathleen M. Doherty, Program Manager, SEACORP, LLC, 62 Johnny Cake Hill, Middletown, RI 02842, (401) 847-2260
2. Caroline Varteresian, Plaintiff's former Program Manager, 4 J H Dwyer Dr. Middletown, RI 02842, (508) 472-2771
- 3.
4. Matthew T. Konrad – Plaintiff's former System's Engineer, 98 Green Hill Rd. Killingworth, CT 06419, (203) 623-9980
- 5.
6. Jeffrey A. Schult- Plaintiff's former System's Engineer, 68 Warner Avenue, Middletown, CT 06457, (845) 219-4598
- 7.
8. Daniel R. Todd – Plaintiff's former System's Engineer, 681 Groton Long Point Road, Groton, CT 06340, (774) 571-8435
- 9.
10. Christopher Wu, Chief Executive Officer, Titan One Zero, LLC, 7666 Fullerton Rd Unit G, Springfield, VA 22153, (571) 388-3362
- 11.
12. Brian Mooney, Plaintiff's former System's Engineer, 4 Cedar Drive, North Stonington, CT 06359, (585) 729-4357

Excerpted pages from the transcript of the deposition for each of the above-referenced witnesses, containing the specific portions of testimony Plaintiff seeks to introduce at trial, has been separately and contemporaneously served on counsel for Defendant.

SEACORP reserves the right to call any witnesses identified in the witness lists of any other party.

SEACORP reserves the right to call any witness who may be necessary for impeachment or rebuttal.

II. EXHIBIT LIST

Ex. #	Description	Bates Range
1.	Email from Sanford to Vetovis	SEACORP_0000456
2.	Email thread transmitting Remote Sensing Solutions quote	SEACORP_0000964-65
3.	Subcontract Agreement Reconfigurable Multi-Modal Sensor	SEACORP_0000967-96
4.	Email from Wu to Goetz	SEACORP_0000963-66
5.	Internal SEACORP Email	SEACORP_0001123
6.	Email from Wright to Varteresian	SEACORP_0001116-17
7.	Contract Status Report	SEACORP_0001124
8.	SEACORP Conversion Documents	SEACORP_0006579-86
9.	Reconfigurable Multi-Modal Sensor BAA Kick-Off Meeting Presentation - Milestone 1	TITAN000670-91
10.	Email from Wu to SEACORP – Initial Milestone Deliverables	SEACORP_0001323-25
11.	Remote Sensing Solutions Invoice; SEACORP Receiving Log; Email Correspondence; Infinite Electronics International Invoice, May 27, 2021 [AEO]	SEACORP_0005049-55
12.	Payment Voucher and SEACORP's Invoice	SEACORP_0004851-52
13.	Concept of Operations for Reconfigurable Multi-Modal Sensor Payload	SEACORP_0002164-74
14.	Email from Vetovis to Titan One Zero	SEACORP_0001726-28
15.	Email from Reyes to Vetovis	SEACORP_0001734-35
16.	Email from Mooney to Reyes	SEACORP_0002142-47
17.	Internal SEACORP Email	SEACORP_0002221-29

Ex. #	Description	Bates Range
18.	Reconfigurable Multi-Modal Sensor Payload SEACORP Current Capability Documentation	SEACORP_0002155-56
19.	Stop Work Letter from Wu to Goetz-Patridge	SEACORP_0002247
20.	Internal SEACORP Email	SEACORP_0002258
21.	SEACORP's Labor Totals	
22.	Email from Vetovis to Deitz	SEACORP_0002271-72
23.	Email from Camara to Titan One Zero	SEACORP_0002376-77
24.	Email from Vetovis to Wu	TITAN000720-23
25.	Internal SEACORP Email	SEACORP_0002496-2501
26.	Internal SEACORP Email	SEACORP_0002628-29
27.	Internal SEACORP Email	SEACORP_0002653-58
28.	Milestone 3 Email from Mooney to Titan One Zero	SEACORP_0002698
29.	Reconfigurable Multi-Modal Sensor Payload SEACORP Current Capability Documentation	SEACORP_0002666-68
30.	Concept of Operations for Reconfigurable Multi-Modal Sensor Payload	SEACORP_0002699-2709
31.	Milestone 3 deliverables	
32.	Email from Reyes to SEACORP	SEACORP_0002750-51
33.	Internal SEACORP Email	
34.	Milestone 4 deliverables	
35.	Milestone 4 Email from Mooney to Titan One Zero	SEACORP_0002992-93
36.	Subcontract Agreement Reconfigurable Multi-Modal Sensor – MOD 1 v3	SEACORP_0003416-19
37.	Email from Mooney to Reyes	TITAN001354-55

Ex. #	Description	Bates Range
38.	Email from Mooney to Reyes	TITAN001356
39.	Milestone 5 Email from Mooney to Titan One Zero	SEACORP_0003768
40.	Milestone 5 Email from Mooney to Titan One Zero	SEACORP_0003248
41.	Milestone 5 deliverables	
42.	Reconfigurable Multi-Modal Sensor Payload Software Design Document	
43.	Email from Mooney to Walsh	TITAN001377
44.	Milestone 6 Email from Reyes to Mooney	SEACORP_0003297-98
45.	Email from Silva to Mooney	TITAN001383
46.	Milestone 6 deliverables	
47.	Payment Voucher and SEACORP's Invoice	SEACORP_0004853-54
48.	Partial Stop Work Order	SEACORP_0003495
49.	Email from Wu to Vetovis	TITAN000820
50.	Email from Titan One Zero AP to SEACORP	SEACORP_0003537-41
51.	Email from Titan One Zero AP to SEACORP	SEACORP_0003769-72
52.	Material Received-Voucher Report	SEACORP_0004990
53.	SEACORP Letter to Remote Sensing Solutions	SEACORP_0003559
54.	Letter from Titan One Zero to SEACORP	TITAN000843
55.	Milestone 7 deliverables	
56.	Remote Sensing Solutions Invoice	SEACORP_0005149
57.	Email thread regarding Stop Work Order final RFI notice from Flynn to Wu	TITAN000840-43
58.	Email thread regarding Stop Work Order final RFI notice from Wu to Vetovis and Goetz	SEACORP_0003865-70

Ex. #	Description	Bates Range
59.	SEACORP Letter to Titan One Zero	TITAN000583
60.	SEACORP EMG 21-009 Audit Response to Titan One Zero	SEACORP_0006351
61.	Email from Goetz-Patridge to Wu	TITAN000257
62.	Email from Keller to Goetz-Patridge	TITAN000863
63.	Internal SEACORP Email	SEACORP_0004292
64.	Partial Stop-Work Order	TITAN001109
65.	Payment Voucher and SEACORP's Invoice	SEACORP_0004301-02
66.	Subcontract Agreement Reconfigurable Multi-Modal Sensor – MOD 2	TITAN000800-02
67.	Email from Zaleski to Goetz	SEACORP_0004991-92
68.	Payment Voucher and SEACORP's Invoice	SEACORP_0004861-62
69.	Email from Cadorette to Wu	TITAN000222-25
70.	Internal SEACORP Email	SEACORP_0004726-31
71.	Internal SEACORP Email	SEACORP_0004741-42
72.	Email from Cadorette to Wu	TITAN001153-55
73.	SEACORP Labor Actuals Report	
74.	SEACORP's Answers to Interrogatories	
75.	Titan One Zero's Answers to Interrogatories	
76.	SEACORP damages Computation Documents (SEACORP's Costs; Payment Voucher 3/17/2022; Non-Labor Detail Report; Labor Summary Report; Project Status Report)	SEACORP_0005041-42; SEACORP_0004861-62; SEACORP_0005043-48; SEACORP_0005038-39; SEACORP_0005040

SEACORP reserves the right to rely on any exhibit disclosed on any other party's exhibit list.

SEACORP reserves the right to rely on any exhibit necessary for impeachment or rebuttal.

Respectfully submitted,

SEACORP, LLC

Dated: July 19, 2023

By: /s/ Matthew E. Feinberg

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CERTIFICATE OF SERVICE

I, Matthew E. Feinberg, hereby certify that on July 19, 2023, a true copy of the foregoing document was served on the attorneys of record for Defendant by delivering a copy of the same via electronic mail to:

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